

NMA:JDG/JMK
F.#2011R01816

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ NOV 30 2011 ★

BROOKLYN OFFICE

- - - - -X

UNITED STATES OF AMERICA

- against -

SEMYON BUMAGIN,

Defendant.

I N D I C T M E N T

CR 11 300
Cr. No. **KUNTZ, J.**
(T. 18, U.S.C., §§
922(g)(1), 924(a)(2),
924(c)(1)(A)(i), 924(d),
1951(a), 2 and
3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28
U.S.C., § 2461(c))

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THE GRAND JURY CHARGES:

GO, M.J.

COUNT ONE

(Hobbs Act Robbery Conspiracy)

1. In or about and between August 2011 and October 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SEMYON BUMAGIN, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: robbery of watches and other jewelry from one or more persons at a warehouse in Long Island, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO

(Illegal Use of a Firearm)

2. In or about October 2011, within the Eastern District of New York and elsewhere, the defendant SEMYON BUMAGIN,

together with others, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count One, and did knowingly and intentionally possess said firearm in furtherance of such crime of violence.

(Title 18, United States Code, Sections
924(c)(1)(A)(i), 2 and 3551 et seq.)

COUNT THREE
(Felon in Possession of Ammunition)

3. On or about October 17, 2011, within the Eastern District of New York, the defendant SEMYON BUMAGIN, having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: .9 millimeter A-Merc ammunition.

(Title 18, United States Code, Sections 922(g)(1),
924(a)(2) and 3551 et seq.)

COUNT FOUR
(Felon in Possession of a Firearm)

4. On or about October 18, 2011, within the Eastern District of New York, the defendant SEMYON BUMAGIN, having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and

intentionally possess in and affecting commerce a firearm, to wit: a .9 millimeter Hi-Point semi-automatic handgun.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts Two through Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(g)(1) or 924, or any violation of any criminal law of the United States, including but not limited to a .9 millimeter Hi-Point semi-automatic handgun and a box of .9 millimeter A-Merc ammunition.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

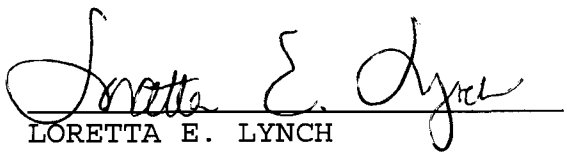
(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 21, United States Code, Section 853(p); Title 18, United States Code, Section 924(d))

A TRUE BILL


FOREPERSON


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

SEMYON BUMAGIN,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(c)(1)(A)(I), 924(d), 1951(a), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28 U.S.C., § 2461(c))

A true bill.


Foreman

Filed in open court this ----- day,

of ----- A.D. 20 -----

Clerk

Bail, \$ -----

James D. Gatta and Jacquelyn M. Kasulis
Assistant United States Attorneys